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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Case No. 3:12-cv-02265-SI

Plaintiff,

v.

**PLAINTIFF'S RESPONSE TO THE
COURT'S ORDER REGARDING 2021
SCHEDULING**

CITY OF PORTLAND,

Defendant.

Plaintiff United States respectfully submits this response to the Court's request for comments on scheduling in its January 12, 2021, Order Regarding 2021 Scheduling Conference. ECF 227.

The United States does not oppose the Court rescheduling the February 25 in-person hearing to the summer or fall, as public health conditions permit. As suggested by the Court, DOJ does not anticipate requesting termination of the Agreement in February. *See* ECF 171, Am. Settlement Agreement, ¶ 175 (establishing prerequisites for termination).

DOJ is preparing its fifth periodic compliance assessment report and plans to file it with the Court in February, even if the in-person hearing is postponed. After filing its report with the Court, DOJ intends to follow past practice and present its compliance assessment to the Portland Committee on Community Engaged Policing at a monthly public meeting.

In addition, DOJ sees value in holding a virtual hearing on February 25, 2021, regarding DOJ's forthcoming compliance assessment report, in addition to an in-person hearing in the summer or fall. This would afford the opportunity for contemporaneous consideration of the report.

Dated this 26th day of January, 2021.

<p>BILLY J. WILLIAMS United States Attorney District of Oregon</p> <p>RENATA A. GOWIE Chief, Civil Division</p> <p><u>/s/ Jared D. Hager</u> JARED D. HAGER Assistant U.S. Attorney</p>	<p>GREGORY B. FRIEL Deputy Assistant Attorney General United States Department of Justice Civil Rights Division</p> <p>STEVEN H. ROSENBAUM Chief, Special Litigation Section</p> <p><u>/s/ Laura L. Cowall</u> LAURA L. COWALL Deputy Chief</p> <p><u>/s/ R. Jonas Geissler</u> R. JONAS GEISLER Trial Attorney</p>
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